Message

**Sent**: 11/2/2018 5:39:45 PM
**To**: Dan Johnson [DanJohnson@florencecopper.com]
**CC**: Albright, David [Albright.David@epa.gov]; Maribeth E. Greenslade [Greenslade.Maribeth@azdeq.gov]
**Subject**: RE: MIT Testing in Equipped Injection Wells

Hi Dan,
We understand why the standard annular pressure test (SAPT) cannot be performed with the as -built injection well configuration, but why is the packer set below the uppermost screened interval? Is this a permanent configuration or temporary depending on the option to inject only in selected screened intervals? If the packer is installed above all screened intervals, a SAPT can be performed. The as/built configuration will allow the pressurization of the casing/tubing annulus and would seem to defeat the purpose of annulus pressure monitoring. Please provide clarification.
Thanks, Nancy

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**From:** Dan Johnson <DanJohnson@florencecopper.com>
**Sent:** Thursday, November 1, 2018 5:46 PM
**To:** Rumrill, Nancy <Rumrill.Nancy@epa.gov>
**Cc:** Albright, David <Albright.David@epa.gov>; Maribeth E. Greenslade <Greenslade.Maribeth@azdeq.gov>
**Subject:** MIT Testing in Equipped Injection Wells

Hi Nancy,

Per our earlier conversation, below is a description on why Mechanical Integrity Testing (MIT) cannot be conducted on equipped Injection Wells:

*MIT testing was conducted on the fiberglass casing prior to the installation of the grout seal, per the fiberglass casing manufacturers recommendations, and once again after cement grouting and well development, per the requirements of the UIC permit. This procedure was completed on every fiberglass cased well (Injection, Recovery, WestBay, and Observation wells).*

*Once the injection wells were tested, they were equipped with injection piping, packers, sounding tubes, and transducers. The packer was placed in the first 316L stainless steel blank interval at approximately 650 feet below land surface in each injection well. The upper screened interval starts at approximately 520 feet and extends to approximately 640 feet. There is no physical way to isolate the blank casing between 520 feet and land surface with the current equipment configuration, because solutions would pass into the upper screened interval between 520 and 640 feet.*

Please let me know if there are any further questions about this description.

Best Regards,
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**Dan Johnson** VP | General Manager

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